

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS - SHERMAN DIVISION**

<b>LURACO HEALTH &amp; BEAUTY, LLC,</b>	§	
<b>Plaintiff,</b>	§	<b>4:19-cv-00051-ALM-KPJ</b>
	§	
<b>v.</b>	§	
	§	
<b>VU TRAN, <i>et al.</i></b>	§	
<b>Defendants.</b>	§	

**UNOPPOSED MOTION TO  
AMEND CASE STYLE AND CORRECT NAME**

**COMES NOW** Plaintiff Luraco Health & Beauty, LLC (“Plaintiff”) and makes this Unopposed Motion to Change Case Style (“Motion”). In support of this Motion, Plaintiff would show the Court the following:

The full style of this case does not accurately reflect the full and correct names of all named defendants; specifically, defendant Lucy Sam’s Spa & Nail Supply, Inc. is mistakenly listed as “Lucy Sam’s Spa Supply Inc.”

**BACKGROUND**

1. This case was filed on December 21, 2018 in the Northern District of Texas. It was transferred to the Eastern District by court order on January 22, 2019.
2. In anticipation of their waiver of service, counsel for the defendants brought to Plaintiff’s attention that the named defendant, Lucy Sam’s Spa & Nail Supply,

Inc. was listed in error on the Original Complaint (Doc. 1) as “Lucy Sam’s Spa Supply, Inc.” both in the case style and listing of defendants.

3. This case is still in its early stages and has not yet been formally served upon defendants. Counsel for the domestic defendants have stated that upon receipt of the First Amended Complaint, it anticipates waiving service as to domestic defendants only; service to foreign defendant Xuyen Chau Luc MFG. – Trading Co., LTD, a corporate entity located in Vietnam has not been waived.

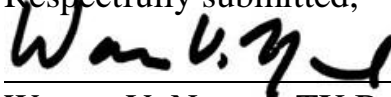
4. Counsel for all domestic parties are unopposed to Plaintiff’s motion to amend the case’s style to reflect the full and correct name of the defendant, “Lucy Sam’s Spa & Nail Supply Inc.”, replacing the incorrect name, and substituting the named defendant as appropriate.

5. A proposed First Amended Complaint is attached as Exhibit A, which Plaintiff will file after the Court grants this Motion, along with the exhibits filed with the Original Complaint to reflect the changes described.

### **PRAYER**

**WHEREFORE PREMISES CONSIDERED,** Plaintiff respectfully requests that the Court grant this Unopposed Motion to Amend Case Style and Correct Name in order to facilitate smooth proceedings prior to and during trial and allow the First Amended Complaint to be filed.

Respectfully submitted,



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Warren V. Norred, TX Bar: 24045094

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Attorney for Plaintiff

Attachments: A) First Amended Complaint; B) Proposed Order

CERTIFICATE OF SERVICE - I certify that a true and correct copy of the above Unopposed Motion to Amend Case Style and Correct Name was served on the counsel for domestic defendants and those asking for notice by the Court's electronic filing system on February 13, 2019:

/s/ Warren V. Norred

Warren V. Norred, TX Bar: 24045094

CERTIFICATE OF CONFERENCE - I certify that on February 13, 2019, I communicated with Jennifer Rynell, counsel for domestic defendants, who indicated that she did not oppose this motion.

/s/ Warren V. Norred

Warren V. Norred, TX Bar: 24045094